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AMERITECH

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 8, 1993

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: CC Docket No. 92-77
Ex Parte Statement

Dear Mr. Canton:

The attached information is being submitted in the above referenced proceeding at the request of the staff of the Common Carrier Bureau, Policy and Program Planning Division.

Sincerely,

A M Alessi

cc: Mr. Phillips
Mr. Nadel

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Revision to BPP Levelized Annual Demand Figures, as provided in Ameritech's June 9, 1993 ex parte statement

Ameritech re-examined its demand methodology by looking at traffic volumes for intraLATA calls originating in its territory today and defining a relationship between intraLATA and interLATA call volumes. With the new methodology, Ameritech first identified intraLATA calls handled by Ameritech. IntraLATA calling card call volumes were then adjusted to reflect the fact that many such calls are placed with interexchange carrier access codes, hence bypassing Ameritech's operator system. Ameritech then assumed interLATA call volumes equal intraLATA call volumes, grew demand to the appropriate time frame assuming a 5% annual growth rate and levelized the figures over a five year period. Utilizing this methodology, the resultant figure varied significantly enough from the original figures to suggest re-submission to the Commission was appropriate.

Breakdown of BPP Deployment Cost Estimate Provided on June 9, 1993 ex parte statement

The new demand figures affect the cost of BPP in a number of areas: operator labor, carrier identification costs associated with increased query volumes and other traffic sensitive plant areas such as trunking, facilities and operator switching system capacity. Ameritech has identified the effect on operator labor and increased query costs.

The following is a component break-down of Ameritech's costs:

Annual Costs

Operator Salaries	$14.1 M
Carrier ID Database Queries	10.3 M
Capital Related Expense	7.3 M

Signaling delay if MF EAOSS is used at the LEC OSS instead of OSS7 for BPP

Ameritech has no empirical data to definitively quantify call set-up time in these two alternative scenarios. However, a few basic pieces of information can provide an order of magnitude on the difference. The two examples which follow are not directly comparable but provide a sense of scale.

With MF signaling, a nominal time for a digit pulse is 150 milliseconds. To pass all of the information forward needed in a BPP environment from the LEC OSS to the IXC POP requires 48 digits of information. Hence, just to pass the necessary digit stream forward in an MF environment would take 7.2 seconds, excluding any time for processing, formatting or hand-shaking on either end.

To contrast, in Ameritech, the time required to formulate and launch a LIDB validation query (i.e., SS7) associated with an intraLATA call and receive and process a response from California takes less than 800 milliseconds.

Ameritech does not support deployment of BPP in an MF EAOSS environment (at the OSS) due to the serious service degradation that would result. Furthermore, while a comprehensive review of the technical feasibility would be required, at a minimum, an upgraded version of software would be needed to provide BPP in the MF EAOSS environment.